

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA,

Plaintiff,

v.

J.B., a minor; Z.B., a minor; and ANNIE L.  
DAVIS, solely in her capacity as guardian  
of J.B. and Z.B., and MARILYN DAVIS,

Defendants.

Civil Action No.: 0:18-cv-03189-DSD-ECW

**DECLARATION OF ERIN F. LISLE  
IN SUPPORT OF PLAINTIFF'S  
APPLICATION FOR ENTRY OF  
DEFAULT**

Now comes Erin F. Lisle who, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a person of full age and majority residing in Minnesota.
2. I am an attorney at Berens & Miller, P.A. and represent Plaintiff, The Prudential Insurance Company of America ("Prudential"), in the above-referenced matter. I am familiar with the matters hereinafter stated.
3. I make this Declaration in Support of Prudential's Application for Entry of Default against Defendant, Zechariah Bolden ("Zechariah"), for failure to answer the Amended Complaint in this matter.
4. The Summons, Complaint, and Amended Complaint were served upon Zechariah on October 22, 2019 as set forth in the Return of Service, filed as Document Number 48 in this matter. As a result, the time within which Zechariah had to answer or otherwise move as to the Complaint expired on November 12, 2019.

5. To date, Zechariah has not answered or otherwise moved in response to the Complaint or Amended Complaint.

6. Prudential, therefore, respectfully requests that the within request for entry of default be granted and default be entered against Defendant, Zechariah Bolden, for failure to answer the Amended Complaint.

7. To the best of my knowledge, Defendant Zechariah Bolden is not a minor, incompetent, nor a member of the military service of the United States. Attached as Exhibit A is a true and correct copy of a print-out dated November 27, 2019 from the Department of Defense Manpower Data Center database showing no military record of Zechariah Bolden under his date of birth and social security number.

I hereby declare, under penalty of perjury, that the foregoing statements are true and correct.

Dated: November 27, 2019

s/Erin F. Lisle  
Erin F. Lisle